

REMARKS/ARGUMENTS

Prior to entry of this amendment, claims 1-11, 13-21, 23-31, 33-36 and 39-43 were pending in this application. Claims 1, 14, and 24 have been amended, claims 4, 7, 8, 17-19, and 27-29 have been canceled, and no claims have been added herein. Therefore, claims 1-3, 5, 6, 9-11, 13-16, 20, 21, 23-26, 30, 31, 33-36 and 39-43 are now pending in this application. The applicants respectfully request reconsideration of this application for at least the reasons presented below.

As an initial matter, the applicants respectfully traverse the finality of the Office Action. More specifically, the applicants respectfully point out that, according to MPEP §706.07(b) cited by the Office Action, a final rejection in a first action after filing of a Request for Continued Examination under 37 C.F.R. 1.114 is proper when the claims "could have been finally rejected on the grounds AND art of record." (emphasis added) Previously, only rejections 35 U.S.C. §101 and 35 U.S.C. §103(a) were present. In this Office Action, a new rejection under 35 U.S.C. §102(b) has been added as the grounds for rejecting claims 39-43 added under the RCE. Thus, even though based on the same references, new grounds for rejection have been added to which the applicants have not been given a chance to reply. Therefore, the applicants respectfully submit that the finality of the Office Action is improper. For at least these reasons, the applications request withdrawal of the finality of the Office Action and/or entry of the amendments presented herein as they are believed to place the claims in condition for allowance as will be explained below.

35 U.S.C. § 102 Rejection, SiteMinder

Claims 39-43 have been rejected under 35 U.S.C. § 102(b) as being anticipated by Netegrity, Inc., *SiteMinder Policy Server Operations Guide*, Version 4.0, published 1997 (hereinafter "SiteMinder") The Applicant respectfully submits the following arguments pointing out significant differences between claims 39-43 submitted by the Applicants and SiteMinder.

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." MPEP 2131 citing *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). Applicants respectfully argue that SiterMinder fails to disclose each and every claimed element. For example, SiterMinder fails to disclose, either expressly or inherently, receiving a user selection of a workflow to affect a target identity profile.

The cited portions of SiteMinder relate to policies and policy domains (p.235-237 and 325-328) and responding to requests for resources (p. 301-304). Under SiteMinder, policies, which may be grouped together into policy domains, control a user's access to resources. Resource within a policy domain, i.e., resource to which a policy domain applies, can be further grouped into realms. Access to the resource is controlled by rules defined for the realm that contains the requested resource. (See pages 235 and 325) The Office Action also cites portions of SiteMinder directed to registration services and allowing a registered user to modify a user profile. See pages 419-435. In this portion of SiteMinder, the user profiles are treated consistent with the treatment of other resources. That is, an administrator can define a registration rule for a particular realm. The rule is applied to control access to the realm that contains the user profile.

However, the cited portions of SiteMinder do not disclose, expressly or inherently, receiving a user selection of a workflow to affect a target identity profile. Rather, the cited portion of SiteMinder directed to allowing a registered user to modify a user profile teaches defining only a single rule for registration services for a particular domain. Furthermore, even if SiteMinder were to allow definition of multiple registration rules for a domain or realm, the cited portions of SiteMinder do not disclose allowing the user to select between the rules. Rather, under the cited portions of SiteMinder, the user is forced to use whatever rule the administrator defines for the realm containing that user profile.

Claim 39, upon which claims 40-43 depend, recites in part "associating workflows with one or more groups in an identity system, each group including one or more users of the identity system and each user of the identity system having an associated identity profile; receiving a request to perform a task that pertains to a target identity profile in the identity system, wherein the request includes an identification of the target identity profile; identifying a set of one or more workflows that perform the task and are associated with groups that include the user associated with the target identity profile; reporting the set of one or more workflows; receiving a user selection of a first workflow from the set of one or more workflows; and performing one or more steps of said first workflow to affect the target identity profile." The cited portions of SiteMinder fail to disclose, either expressly or inherently, receiving a user selection of a workflow to affect a target identity profile. Rather, under the cited portions of SiteMinder, the user is forced to use whatever rule the administrator defines for the realm containing the user profile. For at least these reasons, the rejection is improper and claims 39-43 should be allowed.

35 U.S.C. §103 Rejection, Du in view of SiteMinder

Claims 1-11, 13-21, 23-31 and 33-36 have been rejected under 35 U.S.C. §103(a) as being unpatentable over U. S. Patent No. 6,041,306, to Du et al. (hereinafter "Du") in view of SiteMinder. The Applicants respectfully submit that the Office Action does not establish a *prima facie* case of obviousness in rejecting these claims. Therefore, the Applicants request reconsideration and withdrawal of the rejection.

In order to establish a *prima facie* case of obviousness, the Office Action must establish: 1) some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the references or combine their teachings; 2) a reasonable expectation of success of such a modification or combination; and 3) a teaching or suggestion in the cited prior art of each claimed limitation. See MPEP § 706.02(j). However, as will be discussed below, the references cited by the Office

Action do not teach or suggest each claimed limitation. For example, neither reference, alone or in combination, teaches or suggests receiving a user selection of a workflow to affect a target identity profile.

As discussed in detail above, SiteMinder fails to teach or suggest each claimed limitation. More specifically, the cited portions of SiteMinder fail to teach or suggest receiving a user selection of a workflow to affect a target identity profile. Rather, under the cited portions of SiteMinder, the user is forced to use whatever rule the administrator defines for the realm containing the user profile.

Du is directed to "a system and method for performing flexible workflow process execution in a distributed workflow management system." (Col. 2, lines 59-61) Under Du "the distributed workflow management system is formed by a computer network comprising a plurality of computers." (Col. 3, lines 1-3) "A workflow process management system operates on one or more of the computers to control the computer network in executing the workflow process." (Col. 3, lines 4-7) "Each workflow process includes a sequence of activities, each of which is ordinarily performed by one of the computer systems." (Col. 4, lines 34-36) "The WFPM system provides procedural automation of the workflow process by managing the sequence of process activities and the invocation of appropriate user, machine or microprocessor-controlled device resources associated with the various activity steps." (Col. 4, lines 51-56) That is, Du teaches controlling distribution of processing of tasks between a number of computers in a network. However, Du does not teach or suggest receiving a user selection of a workflow to affect a target identity profile.

The combination of references is no more relevant to the pending claims than either reference alone since neither Du nor the cited portions of SiteMinder teach or suggest, alone or in combination, receiving a user selection of a workflow to affect a target identity profile. Rather Du teaches controlling distribution of processing of tasks between a number of computers in a network while the cited portions of SiteMinder teach registration rules for

controlling access to user profiles where the user is forced to use whatever rule the administrator defines for the realm containing the user profile.

Claim 1, upon which claims 2-11, 13, and 34-36 depend, claim 14, upon which claims 15-21 and 23 depend, and claim 24, upon which claims 25-31 and 33 depend, each recite in part "identifying a set of one more workflows that perform said task and are associated with groups that include said target identity profile, said set of one more workflows includes said first workflow, reporting said set of one more workflows, receiving from a user a selection of said first workflow, and performing one or more steps of said first workflow." Neither Du nor the cited portions of SiteMinder teach or suggest, alone or in combination, receiving a user selection of a workflow to affect a target identity profile. Rather Du teaches controlling distribution of processing of tasks between a number of computers in a network while the cited portions of SiteMinder teach registration rules for controlling access to user profiles where the user is forced to use whatever rule the administrator defines for the realm containing the user profile. For at least these reasons, the rejection is improper and claims 1-11, 13-21, 23-31, and 33-36 should be allowed.

Claim 39, upon which claims 40-43 depend, recites in part "receiving a request to perform a task that pertains to a target identity profile in the identity system, wherein the request includes an identification of the target identity profile; identifying a set of one or more workflows that perform the task and are associated with groups that include the user associated with the target identity profile; reporting the set of one or more workflows; receiving a user selection of a first workflow from the set of one or more workflows; and performing one or more steps of said first workflow to affect the target identity profile." Neither Du nor the cited portions of SiteMinder teach or suggest, alone or in combination, receiving a user selection of a workflow to affect a target identity profile. Rather Du teaches controlling distribution of processing of tasks between a number of computers in a network while the cited portions of SiteMinder teach registration rules for controlling access to user profiles where the user is forced

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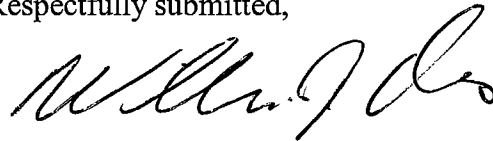
to use whatever rule the administrator defines for the realm containing the user profile. For at least these reasons, the rejection is improper and claims 39-43 should be allowed.

CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this application are in condition for allowance and an action to that end is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 303-571-4000.

Respectfully submitted,



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Enclosure

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